LITE DEPALMA GREENBERG, LLC

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[Additional Counsel on Signature Block]

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

SANJAY SAINI, Individually And On Behalf Of All Other Similarly Situated Residents.

Plaintiff,

VS.

BMW OF NORTH AMERICA, LLC,

Defendant.

Civil Action No. 12-cv-6105(CCC)(JAD)

CLASS ACTION

NOTICE OF PLAINTIFF'S UNOPPOSED MOTION FOR <u>ATTORNEYS' FEES AND EXPENSES</u>

PLEASE TAKE NOTICE that at the Final Approval Hearing scheduled for 11:00 a.m. on March 12, 2015, Plaintiff and the Class will move before Hon. Claire C. Cecchi, U.S.D.J., at the U.S. District Court, M.L. King, Jr. Federal Building & Courthouse, 50 Walnut Street, Newark, New Jersey 07102, for entry of an Order granting the unopposed motion of Plaintiff and the Class seeking the

payment of \$600,000 by Defendant to Plaintiff's Counsel as payment of their attorneys' fees and reimbursement of expenses.

PLEASE TAKE FURTHER NOTICE that plaintiff will rely on the accompanying Memorandum of Law, Stipulation of Class Settlement, Declarations of Bruce D. Greenberg, Jeffrey R. Krinsk, and Matthew E. Pohl and other related materials in support of this motion.

PLEASE TAKE FURTHER NOTICE that Defendant does not oppose this motion and has agreed to pay the amount requested.

Dated: February 3, 2015 LITE DEPALMA GREENBERG, LLC

By:/s/ Bruce D. Greenberg

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CERTIFICATE OF SERVICE

I, Bruce D. Greenberg, hereby certify that on February 3, 2015, I caused a copy of (a) Notice of Plaintiff's Motion For Attorneys' Fees and Expenses; (b) Memorandum of Law in Support of Plaintiff's Motion For Attorneys' Fees and Expenses; (c) Declarations of Counsel; (d) Declaration of Matthew E. Pohl to be served upon all counsel of record through the Court's ECF system.

Dated: February 3, 2015 /s/ Bruce D. Greenberg
Bruce D. Greenberg